PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Topp Industries, Inc.
Highway 25 North
Rochester, Indiana 46975

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T049-9015-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality *Original signed by Janet McCabe*	Issuance Date: May 31, 2001 Expiration Date: May 31, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass reinforced plastics tank and related sewer parts manufacturing operation.

Responsible Official:	Kevin Birchmeier
Source Address:	Highway 25 North, Rochester, Indiana 46975
Mailing Address:	P.O. Box 420, Rochester, Indiana 46975
SIC Code:	3089
County Location:	Fulton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
  (1) one (1) gel coat spray booth, constructed in 1992, utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;
  (2) two (2) resin chop spray booths, each constructed in 1992, each utilizing an atomized spray layup application system, coating a total maximum of 180.54 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. V2 and V3, respectively);
  (3) one (1) winding room, constructed in 1992, which contains two (2) fiberglass winding units with two (2) mandrels each, using a combination of atomized spray layup and filament winding where the filaments are sprayed with resin as they are wound onto the mandrel. Only one mandrel can be operated at a time per winding unit. A maximum of 120.36 plastic tank mold units are coated per hour. Venting occurs at the base of each mandrel, with dry filters for particulate matter overspray control, exhausting through two (2) stacks (ID Nos. V4 and V5);

(b) one (1) paint room, (ID No. EU-02), exhausting through one (1) stack (ID No. V6), containing the following:
  (1) one (1) paint spray booth, constructed in 1992, utilizing a low pressure air atomization spray application system, coating a maximum of 13.0 metal parts per hour, with dry filters for particulate matter overspray control;
  (2) one (1) dip tank, coating a maximum of 13.0 metal parts per hour (this unit is an insignificant activity); and
  (3) one (1) manual coating application operation, coating a maximum of 4.0 metal parts per hour (this unit is an insignificant activity).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. This is a small grinder located in the same booth as the larger cutting and grinding operation with a maximum throughput of 5.4 FRP tanks per hour. [326 IAC 6-3]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventative maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission units, compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
  (1) one (1) gel coat spray booth, constructed in 1992, utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;
  (2) two (2) resin chop spray booths, each constructed in 1992, each utilizing an atomized spray layup application system, coating a total maximum of 180.54 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. V2 and V3, respectively);
  (3) one (1) winding room, constructed in 1992, which contains two (2) fiberglass winding units with two (2) mandrels each, using a combination of atomized spray layup and filament winding where the filaments are sprayed with resin as they are wound onto the mandrel. Only one mandrel can be operated at a time per winding unit. A maximum of 120.36 plastic tank mold units are coated per hour. Venting occurs at the base of each mandrel, with dry filters for particulate matter overspray control, exhausting through two (2) stacks (ID Nos. V4 and V5);

(b) one (1) paint room, (ID No. EU-02), exhausting through one (1) stack (ID No. V6), containing the following:
  (1) one (1) paint spray booth, constructed in 1992, utilizing a low pressure air atomization spray application system, coating a maximum of 13.0 metal parts per hour, with dry filters for particulate matter overspray control;
  (2) one (1) dip tank, coating a maximum of 13.0 metal parts per hour (this unit is an insignificant activity); and
  (3) one (1) manual coating application operation, coating a maximum of 4.0 metal parts per hour (this unit is an insignificant activity).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to the BACT determination under 326 IAC 8-1-6, operating conditions for the FRP tank production process including the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units shall be the following:

(a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to 99 tons per twelve (12) consecutive months.

  (1) Potential VOC emissions from the use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators in the FRP tank production process are less than 99 tons per year. Any change or modification that would increase the potential VOC emissions from the FRP tank production process to greater than 99 tons per year shall require approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1, before such change can occur.

(b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. If all of the resins and/or gel coats used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition D.1.10 is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler.

If non-compliant resins or gel coats are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

The use of resins with monomer contents lower than 35%, the use of gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins and gel coats with monomer contents higher than 35% and 37%, respectively. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) $\leq$ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin or <37% gel coat, and or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, impingement guns, pressure-feed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters or impingement guns, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

(d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The listed work practices shall be followed:

(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint spray booth in the paint room shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, the PM from the gel coat spray booth, the two (2) resin chop spray booths, the two (2) winding units, and the paint spray booth in the paint room shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) The particulate matter (PM) from the cutting and grinding operation shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour based on the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period for any month that non-compliant resins and gel coats are used. Otherwise compliance shall be based on record keeping as required in Condition D.1.10.

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel coat spray booth, the two (2) resin chop spray booths, the two (2) winding units, and the paint spray booth are in operation.

D.1.8 Volatile Organic Compounds (VOC)

(a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to 99 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: “CFA Emission Models for the Reinforced Plastics Industries,” Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coal applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. If all of the resins and/or gel coats used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition D.1.10 is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler.

Note: Compliance with the monomer content limits automatically ensures that potential VOC emissions from the fiberglass production operations at this source are less than 99 tons per year. Therefore, an additional VOC emission limit of 99 tons per year is not necessary. The source will demonstrate that VOC emissions are below 99 tons per year through record keeping.

If non-compliant resins or gel coats are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

The use of resins with monomer contents lower than 35%, the use of gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins and gel coats with monomer contents higher than 35% and 37%, respectively. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) $\leq$ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin or <37% gel coat, and or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat spray booth, the two (2) resin chop spray booths, the winding room, and the paint spray booth stacks (V1, V2, V3, V4, V5, and V6) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken daily or monthly as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin used in the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units. The amount and VOC content of each solvent used shall also be recorded. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The amount and VOC content of each coating material and solvent used in the paint spray booth. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) A log of the dates of use in each booth;

(4) The volume weighted VOC content of the coatings used in the paint spray booth for each day that coatings with a VOC content greater then 3.5 pounds per gallon are used;

(5) The cleanup solvent usage for each month;

(6) The total VOC usage for each month;

(7) The monomer content of resins and gel coats shall be calculated on a neat basis, i.e., excluding any filler, for each month in which noncompliant resins and gel coats are used; and

(8) The weight of VOCs emitted for each compliance period.

(A) VOC emissions from the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: “CFA Emission Models for the Reinforced Plastics Industries,” Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(C) Calculations of VOC emissions shall be performed annually for the annual emission inventory required in Condition C.16. Monthly purchase orders, invoices and material safety data sheets (MSDS) shall be sufficient to allow calculation of monthly VOC emissions from the FRP process.

(b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. This is a small grinder located in the same booth as the larger cutting and grinding operation with a maximum throughput of 5.4 FRP tanks per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

The particulate matter (PM) from the small grinding operation shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour based on the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the small grinding operation at all times that the small grinder is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Topp Industries, Inc.
Source Address: Highway 25 North, Rochester, Indiana 46975
Mailing Address: P.O. Box 420, Rochester, Indiana 46975
Part 70 Permit No.: T049-9015-00018

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Topp Industries, Inc.
Source Address: Highway 25 North, Rochester, Indiana 46975
Mailing Address: P.O. Box 420, Rochester, Indiana 46975
Part 70 Permit No.: T049-9015-00018

This form consists of 2 pages **Page 1 of 2**

This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice by mail or facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Topp Industries, Inc.
Source Address: Highway 25 North, Rochester, Indiana 46975
Mailing Address: P.O. Box 420, Rochester, Indiana 46975
Part 70 Permit No.: T049-9015-00018

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________
Title/Position: ______________________________
Date: ______________________________
Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Topp Industries, Inc.**
Source Location:	**Highway 25 North, Rochester, Indiana 46975**
County:	**Fulton**
SIC Code:	**3089**
Operation Permit No.:	**T049-9015-00018**
Permit Reviewer:	**Trish Earls/EVP**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Topp Industries, Inc. relating to the operation of a fiberglass reinforced plastics tank and related sewer parts manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(a) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
  (1) one (1) gel coat spray booth, utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;
  (2) two (2) resin chop spray booths, each utilizing an atomized spray layup application system, coating a total maximum of 180.54 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. V2 and V3, respectively);
  (3) one (1) winding room, which contains two (2) fiberglass winding units with two (2) mandrels each, using a combination of atomized spray layup and filament winding where the filaments are sprayed with resin as they are wound onto the mandrel. Only one mandrel can be operated at a time per winding unit. A maximum of 120.36 plastic tank mold units are coated per hour. Venting occurs at the base of each mandrel, with dry filters for particulate matter overspray control, exhausting through two (2) stacks (ID Nos. V4 and V5);

(b) one (1) paint room, (ID No. EU-02), exhausting through one (1) stack (ID No. V6), containing the following:
  (1) one (1) paint spray booth, utilizing a low pressure air atomization spray application system, coating a maximum of 13.0 metal parts per hour, with dry filters for particulate matter overspray control;

(2) one (1) dip tank, coating a maximum of 13.0 metal parts per hour (this unit is an insignificant activity); and
(3) one (1) manual coating application operation, coating a maximum of 4.0 metal parts per hour (this unit is an insignificant activity).

Note: Although these units were never permitted, Topp Industries submitted a construction permit application for these units which was received by IDEM, OAM on December 23, 1991. A permit was never processed for this source.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(b) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(h) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. This is a small grinder located in the same booth as the larger cutting and grinding operation with a maximum throughput of 5.4 FRP tanks per hour.

(i) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(j) Other categories with emissions below insignificant thresholds:
(1) Plumbing Department - use of PVC glues with single HAP emissions less than 1 ton per year, total HAP emissions less than 2.5 tons per year, and VOC emissions less than 3 pounds per hour or 15 pounds per day.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*
(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Note: Although these units were never permitted, Topp Industries submitted a construction permit application for these units which was received by IDEM, OAM on December 23, 1991. A permit was never processed for this source. Since the source attempted to obtain a construction permit prior to constructing and operating the emission units, there are no pending enforcement actions as a result of this.

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on September 22, 1997. Additional information was received on June 21, 1999.

A notice of completeness letter was mailed to the source on September 30, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	less than 100
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	greater than 10
MEK	less than 10
Toluene	less than 10
Methyl Methacrylate	less than 10
Ethyl benzene	less than 10
Xylene	less than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.80
PM-10	0.79
SO_2	N/A
VOC	30.63
CO	N/A
NO_x	N/A
HAP (specify)	no data

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	HAPs
FRP Tank Production	0.11	0.11	0.0	72.16	0.0	0.0	69.17	69.22
Surface Coating	0.11	0.11	0.0	11.82	0.0	0.0	1.6	2.3
Cutting/Grinding	0.10	0.06	0.0	0.0	0.0	0.0	0.0	0.0
Total Emissions	0.32	0.28	0.0	83.98	0.0	0.0	69.17	71.49

Note: VOC emissions from the FRP Tank Production process represent the VOC emissions from fiberglass production using the maximum allowable monomer contents for the resins and gel coats of 35% and 37% by weight, respectively, which is required pursuant to 326 IAC 8-1-6 (see detailed discussion of BACT requirements below). Compliance with this limit is required immediately upon permit issuance.

County Attainment Status

The source is located in Fulton County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Fulton County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Fulton County and the potential to emit all criteria pollutants is less than 100 tons per year, therefore, 326 IAC 2-6 does not apply.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4-1.1 (New Source Toxics Control)

The gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units, all constructed in 1992, are not subject to 326 IAC 2-4-1.1. This rule applies to new or reconstructed facilities with potential emissions of any single HAP equal to or greater than ten (10) tons per year and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per year. The rule does not apply to facilities that have been constructed before the effective date of this rule (July 27, 1997). Since the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units are not new or reconstructed facilities, and have been constructed prior to July 27, 1997, the requirements of 326 IAC 2-4-1.1 do not apply. The spray booth, the dip tank, and the hand application operation in the paint room are also not subject to this rule because potential single HAP emissions are less than 10 tons per year and potential total HAP emissions are less than 25 tons per year and each was constructed in 1992.

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) from the gel coat spray booth, the two (2) resin chop spray booths, the two (2) winding units, and the paint spray booth in the paint room shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the gel coat spray booth, the two (2) resin chop spray booths, the two (2) winding units, and the paint spray booth is in operation, in order to comply with this limit.

(b) The particulate matter (PM) from the cutting and grinding operation shall not exceed 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour based on the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times that the cutting and grinding process is in operation in order to comply with this limit.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The FRP tank production process including the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units is subject to the requirements of this rule. This applies to new facilities, constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year, not regulated by other provisions of Article 8. Pursuant to this rule, VOC emissions from these facilities shall be reduced using best available control technology (BACT). Pursuant to the BACT determination under 326 IAC 8-1-6, operating conditions for the FRP tank production process including the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units shall be the following:

(a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to 99 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: “CFA Emission Models for the Reinforced Plastics Industries,” Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coal applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis when using non-compliant resins or gel coats.

Note: Compliance with the monomer content limits automatically ensures that potential VOC emissions from the fiberglass production operations at this source are less than 99 tons per year. Therefore, an additional VOC emission limit of 99 tons per year is not necessary. The source will demonstrate that VOC emissions are below 99 tons per year through record keeping.

The use of resins with monomer contents lower than 35%, the use of gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins and gel coats with monomer contents higher than 35% and 37%, respectively. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) $\leq$ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin or <37% gel coat, and or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(c) Mechanical non-atomized application equipment, such as flow coaters or impingement guns, of a design and specifications to be approved by IDEM, OAM, shall be used.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters or impingement guns, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

(d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The listed work practices shall be followed:

(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The one (1) paint spray booth in the paint room is subject to the requirements of this rule because it was constructed after July 1, 1990 and has actual VOC emissions greater than 15 pounds per day. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint spray booth in the paint room shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

Testing Requirements

Testing is not required for the gel coat spray booth, the two (2) resin chop spray booths, the two (2) winding units, and the paint spray booth because compliance with the VOC emission limits can be demonstrated through record keeping and reporting.

Testing on all other emission units at the source is not required because they do not meet any of the criteria which would require a stack test.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The gel coat spray booth (including the cutting and grinding operation), the two (2) resin chop spray booths, the winding room, and the paint spray booth have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat spray booth, the two (2) resin chop spray booths, the winding room, and the paint spray booth stacks (V1, V2, V3, V4, V5, and V6) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

   (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

   These monitoring conditions are necessary because the dry filters for particulate matter control from these units must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act.

(b) See attached calculations for detailed air toxic calculations. (Appendix A, page 4 of 4)

Conclusion

The operation of this fiberglass reinforced plastics tank and related sewer parts manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T049-9015-00018.**

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Topp Industries, Inc.
Source Location:	Highway 25 North, Rochester, Indiana 46975
County:	Fulton
Operation Permit No.:	T049-9015-00018
SIC Code:	3089
Permit Reviewer:	Trish Earls/EVP

On December 2, 2000, the Office of Air Quality (OAQ) had a notice published in the Rochester Sentinel, Rochester, Indiana, stating that Topp Industries, Inc. had applied for a Part 70 Operating Permit to operate a fiberglass reinforced plastic tank and related sewer parts manufacturing operation with control. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 27, 2000, Topp Industries submitted comments on the proposed Part 70 permit. The summary of the comments and corresponding responses is as follows:

Comment #1

The 99 ton per year limit on VOC emissions should be taken out of the 326 IAC 8-1-6 requirement in the TSD.

Response #1

The limit of 99 tons per year for VOC emissions is associated with the BACT established under 326 IAC 8-1-6. Since the VOC PTE is less than 99 tons per year, the IDEM has determined that reporting is not necessary and that record keeping is sufficient to demonstrate that the VOC emissions remain under 99 tons per year. Therefore no change has been made.

Comment #2

The State Rule Applicability section of the TSD should be changed to reflect that the monomer content of resins and gelcoats shall be calculated on an equivalent mass basis for each month in which noncompliant resins and gelcoats are used instead of monthly. Also remove the monthly requirement for the recording of usage by weight for resins and gel coats from paragraph 1on page 8 of 10 of the TSD.

Response # 2

Record keeping of the monthly usage by weight of resins and gel coats is necessary to determine whether the source is in compliance with the 99 ton per year limit because a demonstration of continuous compliance is required by the permit. Therefore no change has been made to paragraph 1 on page 8 of 10 of the TSD. The permit shall be changed to reflect that the source only needs to calculate the monthly monomer content of resins and gelcoats when using noncompliant resins or gelcoats. Material Safety Data Sheets and monthly record keeping shall be sufficient during months when only compliant coatings are used.

The following revisions have been made to paragraph (b) of the 326 IAC 8-1-6 requirements in the State Rule Applicability for Individual Facilities section of the Technical Support Document (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The FRP tank production process including the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units is subject to the requirements of this rule. This applies to new facilities, constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year, not regulated by other provisions of Article 8. Pursuant to this rule, VOC emissions from these facilities shall be reduced using best available control technology (BACT). Pursuant to the BACT determination under 326 IAC 8-1-6, operating conditions for the FRP tank production process including the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units shall be the following:

(a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to 99 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: “CFA Emission Models for the Reinforced Plastics Industries,” Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coal applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. **If all of the resins and/or gel coats used during a month meet the monomer content without exceeding the values specified, then maintaining records is sufficient for demonstrating compliance.** Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. ~~Compliance with these monomer content limits shall be demonstrated on a monthly basis when using non-compliant resins or gel coats.~~

Note: Compliance with the monomer content limits automatically ensures that potential VOC emissions from the fiberglass production operations at this source are less than 99 tons per year. Therefore, an additional VOC emission limit of 99 tons per year is not necessary. The source will demonstrate that VOC emissions are below 99 tons per year through record keeping.

If non-compliant resins or gel coats are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

The use of resins with monomer contents lower than 35%, the use of gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins and gel coats with monomer contents higher than 35% and 37%, respectively. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) $\leq$ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin or <37% gel coat, and or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

Comment #3

In Condition D.1.1 of the permit, all reference to the 99 ton per year limit for VOC emissions should be removed.

Response #3

The limit of 99 tons per year for VOC emissions is required by IDEM to be in the BACT language even though the PTE is less than 99 tons per year. BACT is a limit by definition and IDEM has selected less than 100 tons per year as a level for which no add on control is required. Since the VOC PTE is less than 99 tons per year, the IDEM has determined that reporting is not necessary and that record keeping is sufficient to demonstrate that the VOC emissions remain under 99 tons per year. Therefore the VOC emissions limit will remain in condition D.1.1. However, paragraph (b) of condition D.1.1 shall be changed to reflect that the source only needs to calculate the monthly monomer content of resins and gelcoats when using noncompliant resins or gelcoats. Material Safety Data Sheets and monthly record keeping shall be sufficient during months when only compliant coatings are used. Paragraph (b) of condition D.1.1 is revised to read as follows:

(b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. **If all of the resins and/or gel coats used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition D.1.10 is sufficient for demonstrating compliance.** Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. ~~Compliance with these monomer content limits shall be demonstrated on a monthly basis.~~

If non-compliant resins or gel coats are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

The use of resins with monomer contents lower than 35%, the use of gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins and gel coats with monomer contents higher than 35% and 37%, respectively. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) $\leq$ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin or <37% gel coat, and or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

Comment #4

Condition D.1.6 should be revised to show that compliance with Condition D.1.1 will be based on record keeping instead of the total volatile organic compound usage for the most recent 12 month period.

Response #4

Condition D.1.6 has been revised as follows:

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period **for any month that non-compliant resins and gel coats are used. Otherwise compliance shall be based on record keeping as required in condition D.1.10**.

Comment #5

In Condition D.1.9, paragraph (a)(1), the words "coating material" is redundant of paragraph (2) and confuses the purpose of paragraph (1). In paragraphs (5) and (6), the references to keeping records by each booth are not necessary since there are no booth-specific limits and VOC's and solvents are addressed in other paragraphs. A new paragraph should be added to ensure that equivalent mass calculations will be performed on a monthly basis when it is appropriate. Another new paragraph should be added to ensure annual calculations of VOC emissions and sufficient records to allow monthly calculations, but does not require the monthly VOC calculation to be performed.

Response #5

Condition D.1.9, which has been re-numbered as D.1.10 due to the addition of a new condition D.1.8 as explained on page 6 below, shall be revised as follows:

D.1.~~9~~**10** Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (~~7~~**8**) below. Records maintained for (1) through (~~7~~**8**) shall be taken daily or monthly as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin used in the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units. The amount and VOC content of each ~~coating material and~~ solvent used shall also be recorded. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The amount and VOC content of each coating material and solvent used in the paint spray booth. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) A log of the dates of use in each booth;

(4) The volume weighted VOC content of the coatings used in the paint spray booth for each day that coatings with a VOC content greater then 3.5 pounds per gallon are used;

(5) The cleanup solvent usage ~~in each booth~~ for each month;

(6) The total VOC usage ~~in each booth~~ for each month;

(7) The monomer content of resins and gel coats shall be calculated on a neat basis, i.e., excluding any filler, for each month in which noncompliant resins and gel coats are used; and

(~~7~~**8**) The weight of VOCs emitted for each compliance period.

(A) VOC emissions from the gel coat spray booth, the two (2) resin chop spray booths, and the two (2) winding units shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(C) Calculations of VOC emissions shall be performed annually for the annual emission inventory required in Condition C.16. Monthly purchase orders, invoices and material safety data sheets (MSDS) shall be sufficient to allow calculation of monthly VOC emissions from the FRP process.

(b) To document compliance with Condition D.1.~~8~~**9**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review the OAQ has made the following changes to the permit:

All Part 70 permit documents have been revised to reflect the name change of the Office of Air Management (OAM) to the Office of Air Quality (OAQ).

The construction dates have been added to the facility descriptions in A.2 as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) one (1) fiberglass reinforced plastic (FRP) tank production process (ID No. EU-01), consisting of the following:
  (1) one (1) gel coat spray booth, **constructed in 1992,** utilizing a spray layup application system, coating a maximum of 300.9 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack (ID Nos. V1). This booth also serves as a cutting and grinding booth, trimming a maximum of 5.4 FRP tanks per hour;
  (2) two (2) resin chop spray booths, **each constructed in 1992,** each utilizing an atomized spray layup application system, coating a total maximum of 180.54 plastic tank mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. V2 and V3, respectively);
  (3) one (1) winding room, **constructed in 1992,** which contains two (2) fiberglass winding units with two (2) mandrels each, using a combination of atomized spray layup and filament winding where the filaments are sprayed with resin as they are wound onto the mandrel. Only one mandrel can be operated at a time per winding unit. A maximum of 120.36 plastic tank mold units are coated per hour. Venting occurs at the base of each mandrel, with dry filters for particulate matter overspray control, exhausting through two (2) stacks (ID Nos. V4 and V5);

(b) one (1) paint room, (ID No. EU-02), exhausting through one (1) stack (ID No. V6), containing the following:
  (1) one (1) paint spray booth, **constructed in 1992,** utilizing a low pressure air atomization spray application system, coating a maximum of 13.0 metal parts per hour, with dry filters for particulate matter overspray control;
  (2) one (1) dip tank, coating a maximum of 13.0 metal parts per hour (this unit is an insignificant activity); and
  (3) one (1) manual coating application operation, coating a maximum of 4.0 metal parts per hour (this unit is an insignificant activity).

These descriptions have also been changed in the facility description box in D.1.

A Risk Management Plan has never been submitted to IDEM for this source, therefore paragraph (c) of C.13 has been removed.

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); ~~and~~

~~(c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.~~

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

A condition for compliance determination has been added to Section D.1 as follows:

D.1.8 Volatile Organic Compounds (VOC)

(a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to 99 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coal applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. Also, gel coats used shall be limited to maximum monomer contents of 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. If all of the resins and/or gel coats used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified under condition D.1.10 is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler.

Note: Compliance with the monomer content limits automatically ensures that potential VOC emissions from the fiberglass production operations at this source are less than 99 tons per year. Therefore, an additional VOC emission limit of 99 tons per year is not necessary. The source will demonstrate that VOC emissions are below 99 tons per year through record keeping.

If non-compliant resins or gel coats are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

The use of resins with monomer contents lower than 35%, the use of gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins and gel coats with monomer contents higher than 35% and 37%, respectively. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) ≤ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin or <37% gel coat, and or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

The numbering of the other D.1 conditions, and the Table of Contents has been changed to reflect this addition.

The Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the Compliance Branch, not the Compliance Data Section. IDEM has negotiated with the EPA on the reporting of emergencies. They agree to allow the 2 day notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official, therefore will comply with the Part 70 requirement to have all reports certified.

The Semi-Annual Compliance Monitoring Report, is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. OAQ is no longer requiring sources to report deviations in ten days, therefore every source will need to submit this report quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR ~~MANAGEMENT~~ QUALITY

~~AIR~~ COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
~~EMERGENCY/DEVIATION~~ EMERGENCY OCCURRENCE REPORT

Source Name: Topp Industries, Inc.
Source Address: Highway 25 North, Rochester, Indiana 46975
Mailing Address: P.O. Box 420, Rochester, Indiana 46975
Part 70 Permit No.: T049-9015-00018

This form consists of 2 pages **Page 1 of 2**

~~Check either No. 1 or No.2~~ ~~9~~ ~~1.~~ This is an emergency as defined in 326 IAC 2-7-1(12)

- ☐ The Permittee must notify the Office of Air ~~Management~~ **Quality** (OA~~M~~**Q**), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- ☐ The Permittee must submit notice ~~in writing or~~ by **mail or** facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.~~9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)~~
- ~~☐ The Permittee must submit notice in writing within ten (**10**) calendar days~~

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the ~~Emergency/Deviation~~ **Emergency**:
Describe the cause of the ~~Emergency/Deviation~~ **Emergency**:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time ~~Emergency/Deviation~~ **Emergency** started:
Date/Time ~~Emergency/Deviation~~ **Emergency** was corrected:
Was the facility being properly operated at the time of the ~~emergency/deviation~~ **emergency**? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during ~~emergency/deviation~~ **emergency**:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR ~~MANAGEMENT~~ QUALITY
COMPLIANCE ~~DATA SECTION~~ BRANCH

PART 70 OPERATING PERMIT
~~SEMI-ANNUAL COMPLIANCE MONITORING REPORT~~ QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Topp Industries, Inc.
Source Address: Highway 25 North, Rochester, Indiana 46975
Mailing Address: P.O. Box 420, Rochester, Indiana 46975
Part 70 Permit No.: T049-9015-00018

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the ~~compliance monitoring~~ requirements stated in this permit. This report shall be submitted quarterly **based on a calendar year**. Any deviation from the ~~compliance monitoring~~ requirements**,** ~~and~~ the date(s) of each deviation**, the probable cause of the deviation, and the response steps taken** must be reported. **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.** Additional pages may be attached if necessary. ~~This form can be supplemented by attaching the Emergency/Deviation Occurrence Report~~. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

~~**Compliance Monitoring**~~ **Permit Requirement** (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

~~**Compliance Monitoring**~~ **Permit Requirement** (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

~~**Compliance Monitoring**~~ **Permit Requirement** (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________
Title/Position: ______________________________
Date: ______________________________
Phone: ______________________________

Attach a signed certification to complete this report.

Appendix A: Emission Calculations Summary

Company Name: Topp Industries, Inc.
Address City IN Zip: Highway 25 North, Rochester, Indiana 46975
Operation Permit No.: T049-9015
Plt ID: 049-00018
Reviewer: Trish Earls/EVP
Date: May 3, 1999

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Fiberglass Reinforced Plastics Production	Surface Coating	Cutting/Grinding*	**TOTAL**
PM	8.05	8.12	6.80	22.97
PM10	8.05	8.12	4.50	20.67
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	72.16	11.82	0.00	83.98
CO	0.00	0.00	0.00	0.00
total HAPs	69.22	2.27	0.00	71.49
worst case single HAP	(Styrene) 69.17	(Xylene) 1.63	0.00	(Styrene) 69.17

Total emissions based on rated capacity at 8,760 hours/year.
* PM and PM-10 emissions from cutting/grinding are based on emission factors provided by the applicant where the volume of a typical cut is measured and then subjected to a sieve analysis.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Fiberglass Reinforced Plastics Production	Surface Coating	Cutting/Grinding*	**TOTAL**
PM	0.11	0.11	0.10	0.32
PM10	0.11	0.11	0.06	0.28
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	72.16	12.25	0.00	84.41
CO	0.00	0.00	0.00	0.00
total HAPs	69.22	2.27	0.00	71.49
worst case single HAP	(Styrene) 69.17	(Xylene) 1.63	0.00	(Styrene) 69.17

Total emissions based on rated capacity at 8,760 hours/year, after control.
* PM and PM-10 emissions from cutting/grinding are based on emission factors provided by the applicant where the volume of a typical cut is measured and then subjected to a sieve analysis.

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Fiberglass Processes

Company Name: Topp Industries, Inc.
Address City IN Zip: Highway 25 North, Rochester, Indiana 46975
Operation Permit No.: T049-9015
Plt ID: 049-00018
Reviewer: Trish Earls/EVP
Date: May 3, 1999

State Potential Emissions (uncontrolled):

Material (as applied)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Emission Factor lb emitted per ton resin/gel-coat processed	Gal of Mat (gal/unit)	Maximum (unit/hour)	Volume % Non-Vol (solids)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Mechanical Non-Atomized Resin Application - FRP Production												
Odd Lot Resin**	10.84	35.00%	77.00	0.09200	180.54	65.00%	6.93	166.37	30.36	0.00	5.84	100.00%
Body Filler*	9.59	22.00%	55.44	0.00007	180.54	78.00%	3.4E-03	0.08	0.01	0.00	2.70	100.00%
Gel Coat Application - FRP Production												
Polycor Gray**	10.21	37.00%	377.00	0.00380	300.90	63.00%	2.20	52.81	9.64	8.05	8.00	75.00%
Mechanical Non-Atomized and Filament Winding Resin Application - FRP Production* **												
Odd Lot Resin**	10.84	35.00%	77.00	0.09200	120.36	65.00%	4.62	110.91	20.24	0.00	5.84	100.00%
Body Filler*	9.59	22.00%	55.44	0.00007	120.36	78.00%	2.2E-03	0.05	0.01	0.00	2.70	100.00%
FRP Production - Clean Up												
Styrene	7.51	100.00%	N/A	0.00090	300.90	0.00%	2.03	48.81	8.91	0.00	N/A	100.00%
Acetone	6.62	0.00%	N/A	0.01800	300.90	0.00%	0.00	0.00	0.00	0.00	N/A	100.00%
S-0280 Super Flush	8.87	100.00%	N/A	0.00020	300.90	0.00%	0.53	12.81	2.34	0.00	N/A	100.00%
FRP Production - Mold Release												
TR 210 Self Stripping Liquid Mold Release	7.20	100.00%	N/A	7.00E-06	300.90	0.00%	0.02	0.36	0.07	0.00	N/A	100.00%
FRP Production - Catalyst												
Cadox D-50****	9.76	100.00%	48.00	0.00190	300.90	0.00%	0.13	3.21	0.59	0.00	N/A	100.00%
Total State Potential Emissions:							**16.48**	**395.42**	**72.16**	**8.05**		

Federal Potential Emissions (controlled):

	Material Usage Limitation	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Total Federal Potential Emissions:	N/A	0.00%	98.60%	**16.48**	**395.42**	**72.16**	**0.11**

Notes:
* The body filler is applied manually. Therefore, emission factors for manual application were used.
** The weight percent monomer in the resins and gelcoat represents the maximum monomer content allowed pursuant to the requirements of 326 IAC 8-1-6 (BACT).
*** The mechanical non-atomized and filament winding process is a combination of impingement gun resin layup and filament winding where resin is applied to the filaments with impingement guns as they are wound onto the mandrel. Because the resin is applied with mechanical non-atomized guns, the emission factors for mechanical non-atomized resin application were used to conservatively estimate potential emissions.
**** The emission factor for the catalyst represents the percent of VOC which flashes off expressed as lb VOC emitted per ton catalyst used. Based on manufacturer's data, 2.4% of the catalyst flashes off because the remainder of the catalyst is reacted in the process.

Methodology:
Potential VOC Pounds per Hour = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1 ton/2000 lbs * Emission Factor
Potential VOC Pounds per Day = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1 ton/2000 lbs * (24 hr/day) * Emission Factor
Potential VOC Tons per Year = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (1 ton/2000 lbs) * Emission Factor * (8760 hrs/yr) * 1 ton/2000 lbs
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Controlled VOC emission rate = uncontrolled emission rate * Material usage limitation
Controlled PM emission rate = uncontrolled emission rate * (1 - control efficiency) * Material usage limitation
Emission Factors are based on the Unified Emission Factors for Open Molding of Composites, developed by the CFA for the Reinforced Plastics Industries, April, 1999.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Topp Industries, Inc.
Address City IN Zip: Highway 25 North, Rochester, Indiana 46975
Operation Permit No.: T049-9015
Plt ID: 049-00018
Reviewer: Trish Earls/EVP
Date: May 3, 1999

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Paint Room - Spray Booth																
Black Air Dry Enamel	9.57	36.60%	0.0%	36.6%	0.0%	46.60%	0.04700	13.00	3.50	3.50	2.14	51.36	9.37	8.12	7.52	50%
Laquer Thinner (clean up)	6.63	100.00%	0.0%	100.0%	0.0%	0.00%	0.00080	13.00	6.63	6.63	0.07	1.65	0.30	0.00	N/A	50%
Paint Room - Dip Tank																
Black Air Dry Enamel	9.57	36.60%	0.0%	36.6%	0.0%	46.60%	0.00440	13.00	3.50	3.50	0.20	4.81	0.88	0.00	N/A	100%
Paint Room - Hand Application																
Black Coal Tar Epoxy	10.00	24.00%	0.0%	24.0%	0.0%	76.00%	0.02500	4.00	2.40	2.40	0.24	5.76	1.05	0.00	N/A	100%
Part Z (Coal Tar) Hardener	9.70	0.00%	0.0%	0.0%	0.0%	0.00%	0.02500	4.00	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
Plumbing																
Green Gene (PVC Cement)	7.76	100.00%	0.0%	100.0%	0.0%	0.00%	0.00000	14.00	7.76	7.76	0.00	0.00	0.00	0.00	N/A	100%
Oatey Purple Prime	6.59	100.00%	0.0%	100.0%	0.0%	0.00%	0.00050	14.00	6.59	6.59	0.05	1.11	0.20	0.00	N/A	100%
Key tite (Pipe Joint Compound)	8.00	3.00%	0.0%	3.0%	0.0%	97.00%	0.00060	14.00	0.24	0.24	0.00	0.05	0.01	0.00	0.25	100%
										Total State Potential Emissions:	**2.70**	**64.74**	**11.82**	**8.12**		

Federal Potential Emissions (controlled):

Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	98.60%	**2.70**	**64.74**	**11.82**	**0.11**

Note: mold release and catalyst listed above represent worst case of all mold releases and catalysts used.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Topp Industries, Inc.
Address City IN Zip: Highway 25 North, Rochester, Indiana 46975
Operation Permit No.: T049-9015
Plt ID: 049-00018
Reviewer: Trish Earls/EVP
Date: May 3, 1999

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Emission Factor	Weight % Styrene	Weight % MEK	Weight % Toluene	Weight % Ethyl Benzene	Weight % Xylene	Styrene Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Xylene Emissions (ton/yr)
Mechanical Non-Atomized Resin Application - FRP Production														
Odd Lot Resin	10.84	0.09200	180.54	77.00	35.00%	0.00%	0.00%	0.00%	0.00%	30.36	0.00	0.00	0.00	0.00
Body Filler	9.59	0.00007	180.54	55.44	22.00%	0.00%	0.00%	0.00%	0.00%	0.01	0.00	0.00	0.00	0.00
Gel Coat Application - FRP Production														
Polycor Gray	10.21	0.00380	300.90	377.00	37.00%	0.00%	0.00%	0.00%	0.00%	9.64	0.00	0.00	0.00	0.00
Mechanical Non-Atomized and Filament Winding Resin Application - FRP Production														
Odd Lot Resin	10.84	0.09200	120.36	77.00	35.00%	0.00%	0.00%	0.00%	0.00%	20.24	0.00	0.00	0.00	0.00
Body Filler	9.59	0.00007	120.36	55.44	22.00%	0.00%	0.00%	0.00%	0.00%	0.01	0.00	0.00	0.00	0.00
FRP Production - Clean Up														
Styrene	7.51	0.00090	300.90	N/A	100.00%	0.00%	0.00%	0.00%	0.00%	8.91	0.00	0.00	0.00	0.00
Acetone	6.62	0.01800	300.90	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
S-0280 Super Flush	8.87	0.00020	300.90	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
FRP Production - Mold Release														
TR 210 Self Stripping Liquid Mold Release	7.20	7.00E-06	300.90	N/A	0.00%	0.00%	80.00%	0.00%	3.00%	0.00	0.00	0.05	0.00	0.00
FRP Production - Catalyst														
Cadox D-50	9.76	0.00190	300.90	48.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Paint Room - Spray Booth														
Black Air Dry Enamel	9.57	0.04700	13.00	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Laquer Thinner (clean up)	6.63	0.00080	13.00	N/A	0.00%	11.00%	12.00%	1.00%	6.00%	0.00	0.03	0.04	0.00	0.02
Paint Room - Dip Tank														
Flat Black Enamel	8.91	0.00440	13.00	N/A	0.00%	0.00%	12.00%	6.00%	33.00%	0.00	0.00	0.27	0.13	0.74
Paint Room - Hand Application														
Black Coal Tar Epoxy	10.00	0.02500	4.00	N/A	0.00%	0.00%	0.00%	0.00%	20.00%	0.00	0.00	0.00	0.00	0.88
Part Z (Coal Tar) Hardener	9.70	0.02500	4.00	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Plumbing														
Green Gene (PVC Cement)	7.76	0.00000	14.00	N/A	0.00%	40.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Oatey Purple Prime	6.59	0.00050	14.00	N/A	0.00%	80.00%	0.00%	0.00%	0.00%	0.00	0.16	0.00	0.00	0.00
Key tite (Pipe Joint Compound)	8.00	0.00060	14.00	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions										**69.17**	**0.19**	**0.36**	**0.14**	**1.63**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material usage limitation.
The weight percent styrene in the resins and gelcoat represents the maximum monomer content allowed pursuant to the requirements of 326 IAC 8-1-6 (BACT).